

# **ATTACHMENT 14**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

- - - - - x Case No.  
: 5:14-cv-05344-BLF (PSG)  
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CISCO SYSTEMS, INC., :  
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Plaintiff, :  
:  
vs. :  
:  
ARISTA NETWORKS, INC., :  
:  
Defendant. :  
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VIDEOTAPED DEPOSITION OF GREG SATZ  
March 23, 2016  
HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VOLUME 1

Reported by  
Brooke R. Bohr  
CSR No. 753  
Job No 2272380  
Pages 1 - 168

## HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

<p>1 VIDEOTAPED DEPOSITION OF GREG SATZ, 2 taken at the instance of the Defendant, at the 3 offices of TUCKER &amp; ASSOCIATES, 605 W. Fort 4 Street, in the City of Boise, State of Idaho, 5 commencing at 10:10 a.m., on March 23, 2016, 6 before Brooke R. Bohr, CSR, RPR, a Notary Public 7 in and for the State of Idaho, pursuant to notice, 8 and in accordance with the applicable Rules of 9 Civil Procedure.</p> <p>10 11 APPEARANCES 12 FOR PLAINTIFF John M. Neukom, Esq. 13 QUINN EMAMUEL URQUHART &amp; SULLIVAN LLP 50 California Street, 22nd Floor 14 San Francisco, CA 94111 (415) 875-6320 johnneukom@quinnemanuel.com 15 FOR DEFENDANT Brian L. Ferrall, Esq. 16 KEKER &amp; VAN NEST LLP 633 Battery Street 17 San Francisco, CA 94111 (415) 391-5400 bferrall@kvn.com 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 2</p>	<p>1 BOISE, IDAHO 2 March 23, 2016, 10:10 a.m. 3 4 THE VIDEOGRAPHER: We are now on the record. 5 Please note that the microphones are 6 sensitive and may pick up whispering and private 7 conversations. Please turn off all cell phones or 8 place them away from the microphones as they can 9 interfere with the deposition audio. Recording 10 will continue until all parties agree to go off 11 record. 12 My name is David Cromwell, representing 13 Veritext. The date today is March 23, 2016, and 14 the time is approximately 10:10 a.m. This 15 deposition is being held at Tucker &amp; Associates 16 located at 605 West Fort Street, Boise, Idaho 17 83702, and is being taken by counsel for the 18 defendant. 19 The caption of this case is Cisco 20 Systems, Inc. v. Arista Networks, Inc. This case 21 is filed in the United States District Court, 22 Northern District of California, San Jose 23 Division, Case No. 5:14-CV-05344-BLF PSG. The 24 name of the witness is Greg Satz. 25 At this time, the attorneys present in</p> <p style="text-align: right;">Page 4</p>
<p>1 WITNESS 2 GREG SATZ Page: 3 Examination by Mr. Ferrall 5 4 Examination by Mr. Neukom 151 5 Further Examination by Mr. Ferrall 158 6 7 ***** 8 EXHIBITS 9 10 Page: 11 Exhibit 400 Greg Satz LinkedIn 13 12 Exhibit 401 "TOPS-20 DECnet-20 Programmers 22 Guide and Operations Manual" 13 Exhibit 402 One-page Document with 36 14 Bates No. KL-883 15 Exhibit 403 Document Beginning Bates No. 69 ARISTANDCA00022465 16 Exhibit 404 Document Beginning Bates No. 84 17 CSI-CLI-00359132 18 Exhibit 405 One-page Document Bates No. 106 CSI-CLI-00746924 19 Exhibit 406 Document Bates No. CSI-CLI-01828732 112 20 Through Bates No. CSI-CLI-01828783 21 Exhibit 407 Document Beginning Bates No. 141 CSI-CLI-01295215 22 23 Exhibit 408 Document Beginning Bates No. 143 CSI-CLI-01295181 24 25 *****</p> <p style="text-align: right;">Page 3</p>	<p>1 the room will identify themselves and the parties 2 they represent. 3 MR. FERRALL: Brian Ferrall of Keker &amp; 4 Van Nest on behalf of Arista Networks. 5 MR. NEUKOM: John Neukom for the plaintiff. 6 THE COURT: Our court reporter, Brooke Bohr, 7 representing Veritext, will swear in the witness, 8 and we can proceed. 9 10 GREG SATZ, 11 produced as a witness at the instance of the 12 Defendant, having been first duly sworn, was 13 examined and testified as follows: 14 15 EXAMINATION 16 BY MR. FERRALL: 17 Q. Good morning, Mr. Satz. Can you please 18 state your full name. 19 A. Greg Leonard Satz. 20 Q. Mr. Satz, you are not represented by 21 counsel today; is that right? 22 A. Correct. 23 Q. Have you ever been deposed before? 24 A. I have. 25 Q. All right. So you know the basic</p> <p style="text-align: right;">Page 5</p>

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<p>1 "Stanford Ethertip/Gateway User and Configuration 2 Guide." 3 A. Yeah. 4 Q. Had you ever seen this before? 5 A. I'm sure I have. I don't have a 6 recollection of it, and I don't remember this date 7 at all. This is a pretty late date. 8 Q. Do you know Glenn Truitt? 9 A. I do. 10 Q. What did he work on at Stanford? 11 A. I no longer remember. I do know that 12 he had his hands in this software, but a lot of 13 people did. Jeffrey Mobile, Benji Levy. This 14 was -- this code was a lot of research work. And 15 so if one of the graduate students felt there was 16 an application they wanted to experiment with, 17 this really was the beginning of what then became 18 the multi-protocol router and Cisco's router. 19 So -- oh, yeah, there's some really old -- really 20 old stuff here. 21 Q. Did you become familiar with some of 22 the commands from this device? 23 A. Yes. 24 Q. Yeah? How did you become familiar with 25 it?</p> <p style="text-align: right;">Page 26</p>	<p>1 Q. This was a -- begins a section called 2 "privileged commands." Do you see that? 3 A. Um-hum. I do. 4 Q. And were you aware of a privileged mode 5 in this -- in the TIP Gateway? 6 A. Sure. 7 Q. Explain what was the purpose of the 8 privilege mode there. 9 A. It mimicked the TOPS-20 style of 10 parsing, and it -- there were commands that people 11 would use to just have the device do what it does 12 day-to-day, and there were commands that 13 administrators or users who needed to maintain the 14 device in the network would use. And so privilege 15 commands were the latter set, and TOPS-20 had a 16 very similar model. 17 Q. And this document says in the -- I 18 guess in the second sentence, it's -- or I'll read 19 the first sentence also: There's a second set of 20 commands available to the Ethertip user. The two 21 command levels are disjoint. That is, the 22 privileged mode is not a superset of the normal 23 mode. 24 Do you see that? 25 A. Um-hum.</p> <p style="text-align: right;">Page 28</p>
<p>1 A. Well, we were users of these devices 2 when I -- the state of the art back then, before 3 there were all of these computers and laptops, is 4 you used a basic terminal with RS232 into some 5 device that converted the commands into network 6 protocols and used that across the network to talk 7 to mainframes. That was state of the art. 8 So on my desk at Stanford and at SRI 9 was these computers that were just terminals. 10 They -- all they did was take a capture of 11 keypress and generate a character. And that 12 character was shipped across the network 13 somewhere. And the computer would get that 14 character, do something with it, and ship you back 15 the output. 16 So that's what a TIP was, terminal 17 interface processor. It allowed you to take an 18 RS232 terminal and sit on the network without 19 talking to the computer directly. And I think 20 Kirk was responsible for gluing the TIP and the 21 Gateway software together, because they were two 22 different software bases. 23 Q. So if I could ask you to turn to Page 6 24 of that Exhibit 36. 25 A. Okay.</p> <p style="text-align: right;">Page 27</p>	<p>1 Q. So what did you understand to be the 2 purpose of the normal mode, then, as opposed to 3 the privileged mode? 4 A. Day-to-day users don't need privileged 5 mode. They go in, they make their connections, 6 they do what they do to get their work done, and 7 that's the extent of their relationship to the 8 software. 9 The people who administer the device 10 and who might need to add a new feature or upgrade 11 the software would have to use privileged mode. 12 And it is a complete separate set of functions. 13 And in particular for the programmers, 14 they -- you know, they made a mistake, and they've 15 got to go figure out why something is not working, 16 especially for research work. 17 Q. I want to ask about some of the 18 commands that follow here on Page 6. 19 "Access.lists," I see under 3.1. 20 A. Um-hum. 21 Q. Was that a command you were familiar 22 with? 23 A. That's a very common and important 24 command. 25 Q. What is an access.list command?</p> <p style="text-align: right;">Page 29</p>

## HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

<p>1 Exhibit 405 is a one-page document</p> <p>2 marked CSI-CLI-00746924.</p> <p>3 Exhibit 406 begins CSI-CLI-01828732,</p> <p>4 and for this document I'll read the last number</p> <p>5 because I think we're all unclear whether it is</p> <p>6 one versus multiple documents. This ends with</p> <p>7 Bates stamp CSI-CLI-01828783.</p> <p>8 Exhibit 407 begins Bates stamp</p> <p>9 CSI-CLI-01295215.</p> <p>10 And Exhibit 408 begins</p> <p>11 CSI-CLI-01295181.</p> <p>12 MR. NEUKOM: Thanks all.</p> <p>13 MR. FERRALL: Agreed. Thank you.</p> <p>14 (The deposition concluded at 3:31 p.m.)</p> <p>15 -oo0oo-</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 166</p>	<p>1 REPORTER'S CERTIFICATE</p> <p>2</p> <p>3</p> <p>4 I, BROOKE R. BOHR, a Notary Public in</p> <p>5 and for the State of Idaho, do hereby certify:</p> <p>6 That prior to being examined, the</p> <p>7 witness named in the foregoing deposition was by</p> <p>8 me duly sworn to testify the truth, the whole</p> <p>9 truth, and nothing but the truth;</p> <p>10 That said deposition was taken down by</p> <p>11 me in shorthand at the time and place therein</p> <p>12 named and thereafter reduced into typewriting</p> <p>13 under my direction, and that the foregoing</p> <p>14 transcript contains a full, true, and verbatim</p> <p>15 record of the said deposition.</p> <p>16 I further certify that I have no</p> <p>17 interest in the event of the action.</p> <p>18 WITNESS my hand and seal March 30, 2016.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 &lt;%signature%&gt;</p> <p>24 Brooke R. Bohr</p> <p>25 CSR No. 753</p> <p style="text-align: right;">Page 168</p>
<p>1 VERIFICATION</p> <p>2 I declare under penalty of perjury</p> <p>3 under the laws that the foregoing is</p> <p>4 true and correct.</p> <p>5</p> <p>6 Executed on _____, 20____,</p> <p>7 at _____.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12 _____</p> <p>13 WITNESS SIGNATURE</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 167</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

